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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION**

RICHARD BARBER and BARBARA
BARBER,

Plaintiffs,

v.

REMINGTON ARMS CO., INC.,
SPORTING GOODS PROPERTIES,
INC., and E. I. DuPONT DE
NEMOURS & CO.,

Defendants.

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No. CV-12-43-BU-DLC

**DEFENDANTS' MOTION FOR
PROTECTIVE ORDER**

Defendants Remington Arms Company, LLC (formerly "Remington Arms Company, Inc." hereinafter "Remington"), Sporting Goods Properties, Inc., and E.I. DuPont de Nemours & Co., (collectively "defendants"), by and through their undersigned attorney, move the Court pursuant to Federal Rule of Civil Procedure 26(c)(1) for a Protective Order:

- (1) Staying further discovery from defendants pending the Court's resolution of defendants' fully-briefed Motion to Dismiss Plaintiffs' First Amended Complaint (Doc. 23),

or, alternatively,

- (2) Limiting the scope of permissible discovery from defendants to information and documents relevant to plaintiffs' defamation claim.

Counsel for defendants certifies that pursuant to Federal District Court Local Rule 26.3(c)(1), he has conferred with counsel for plaintiffs in an attempt to resolve this matter without court action.

This motion is supported by the brief filed contemporaneously herewith.

DATED this 21st day of January, 2013.

s/ Robert M. Carlson
Corette Pohlman & Kebe
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of January, 2013, a copy of the foregoing document was served on the following persons by the following means:

1, 2 and 3 by and through the Electronic Case Filing System.

1. Clerk, U.S. District Court
2. Richard Ramler
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/s/ Robert M. Carlson
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